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Attorneys for *Santa Rosa Mall, LLC*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

SEARS HOLDINGS CORPORATION, *et al.*,  
  
Debtors.

Chapter 11

Case No. 18-23538 (RDD)

(Jointly Administered)

**MOTION FOR EXTENSION OF TIME TO FILE**  
**MEMORANDUM OF LAW IN COMPLIANCE WITH COURT ORDER**  
(Related Docket Nos. 6317, 7211, 7311)

TO THE HONORABLE COURT:

COMES NOW Santa Rosa Mall, LLC (“Santa Rosa”), by and through its undersigned counsel, and respectfully states and prays as follows:

1. On January 7, 2019, Santa Rosa filed a *Motion for [] an Order Finding the Automatic Stay Inapplicable or, in the Alternative, for Relief from the Automatic Stay and Memorandum in Support Thereof* (the “*Motion for Relief from Stay*”, Docket No. 6317).

2. On February 10, 2019, the Debtors filed an *Objection to Motion for an Order Finding the Automatic Stay Inapplicable or, in the Alternative, for Relief from the Automatic Stay and Memorandum in Support Thereof* (the “*Objection*”, Docket No. 7211).

3. On February 20, 2020, Santa Rosa filed a *Reply to Debtors’ Objection to Motion for an Order Finding the Automatic Stay Inapplicable or, in the Alternative, for Relief from the Automatic Stay and Memorandum in Support Thereof* (“*Reply*”, Docket No. 7311).

4. At the hearing held on February 24, 2020, the Court ordered Santa Rosa to file a memorandum of law on Puerto Rico's insurance law and scheduled a final hearing on the *Motion for Relief from Stay* for March 23, 2020 (the "Order"). See February 24, 2020, Hr'g. Tr. 72:17-19.

5. The deadline to file and serve the memorandum of law expires today, March 13, 2020 at 11:59 PM (EST). Id.

6. While Santa Rosa has been diligently preparing the memorandum of law, it hereby requests additional time to finalize its research and file the final draft.

7. Accordingly, pursuant to the *Amended Case Management Order* (Docket No. 405, ¶ 25), Santa Rosa respectfully requests a fourteen (14) day extension to file the memorandum, that is, until Friday, **March 27, 2020 at 4:00 PM (EST)**.

8. The Debtors will not be prejudiced by the forgoing extension.

WHEREFORE, Santa Rosa respectfully requests the Court grant fourteen (14) days, that is, until March 27, 2020 at 4:00 PM (EST), to file the memorandum of law,

Respectfully submitted.  
Dated: March 13, 2020.

**Ferraiuoli LLC**

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